

Kelly T. Currie KCurrie@crowell.com (212) 895-4257 direct Crowell & Moring LLP 590 Madison Avenue 20th Floor New York, NY 10022 +1.212.223.4000 main +1.212.223.4134 fax

Dated: November 23, 2022

November 22, 2022 Application Granted. All other conditions of bail shall remain effect. The Clerk of the Court is directed to terminate the letter motion at docket number 50.

By ECF

New York, New York The Honorable Lorna G. Schofield United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> LORNA G. SCHOFIELD UNITED STATES DISTRICT JUDGE

Re: United States v. Ali Cheema; Criminal Docket No: 22 Cr. 615 (LGS)

Dear Judge Schofield:

We represent the defendant Ali Cheema in the above referenced matter. We write request that the conditions of Mr. Cheema's release be modified to allow him to travel to the District of Connecticut from November 25, 2022 to November 26, 2022, and as necessary in the future, in order for him to visit his family. Please note that this request is time-sensitive.

At his presentment in the instant case on September 21, 2022, Magistrate Judge Figueredo ordered Mr. Cheema's release on a \$250,000 bond, secured by a financially responsible cosigner. Mr. Cheema's bond conditions currently permit him to travel within the Southern, Eastern, and Northern Districts of New York. On November 17, 2022, Your Honor granted Mr. Cheema's request to be permitted to travel to the District of Connecticut as necessary to perform his work obligations.

Mr. Cheema seeks permission to accompany his wife to visit his in-laws in Connecticut because his elderly father- and mother-in-law have difficulty traveling. Therefore, Mr. Cheema requests that he be allowed to travel the short distance to, and celebrate the Thanksgiving Holiday at, his in-laws home in, Manchester, CT, from November 25, 2022 to November 26, 2022. Additionally, as family gatherings can arise on short notice, Mr. Cheema is already permitted to travel to the District of Connecticut as necessary for work, and to avoid the burden of submitting a new request for every occasion on which Mr. Cheema would like to interact with his family in person, Mr. Cheema requests that he be allowed to travel to the District of Connecticut to attend family events in the future.

Since his release on bond, Mr. Cheema has complied with all of the conditions of his release and has been in regular contact with Pretrial Services, as required. Mr. Cheema will not

¹ The exact address has been provided to Pretrial Services.



have contact with any of his co-defendants as a result of this proposed bail modification, as the family members he wishes to be allowed to visit in Connecticut are his relatives through marriage, and are not also related to any of his co-defendants.

The prosecutor assigned to Mr. Cheema's case, Assistant United States Attorney Timothy Capozzi, notified us via email on November 21, 2022 that the Government does not have any objections to Mr. Cheema being permitted to travel to the District of Connecticut from November 25, 2022 to November 26, 2022, and as necessary in the future to visit his family. Supervisory U.S. Pretrial Services Officer Josh Rothman notified us via email on November 22, 2022 that the Pretrial Services Office also does not object to Mr. Cheema's requests, on the condition that Mr. Cheema provides his Pretrial Services Officer 48 business hours advance notice when he intends to travel to Connecticut for either work or family visits, which Mr. Cheema commits to do.

Please let us know if you have any questions, or require any documentation in order to evaluate Mr. Cheema's request. Thank you for your consideration of this urgent request.

Respectfully submitted,

Kelly T. Curris

Kelly T. Currie

Cc: AUSA Timothy Capozzi (by email)

Pretrial Services Officer Meherun Mayer (by email)

Supervisory U.S. Pretrial Services Officer Josh Rothman (by email)